

June 16, 2003

Johnny Pappas, Sr. Environmental Engineer  
Plateau Mining Corporation  
P.O. Box 30  
Helper, Utah 84526-0030

Re: Discontinue Subsidence Monitoring, Plateau Mining Corporation, Willow Creek Mine, C/007/038-AM03B, Outgoing File

Dear Mr. Pappas:

The above-referenced amendment is conditionally approved upon receipt of seven clean copies of the text, four copies of the map, and updated C1/C2 form. Please submit these copies by July 11, 2003. Once we receive these copies, final approval will be granted, at which time you may proceed with your plans.

A stamped incorporated copy of the approved plan will also be returned to you at that time, for insertion into your copy of the Mining and Reclamation Plan. A copy of our Technical Analysis is enclosed.

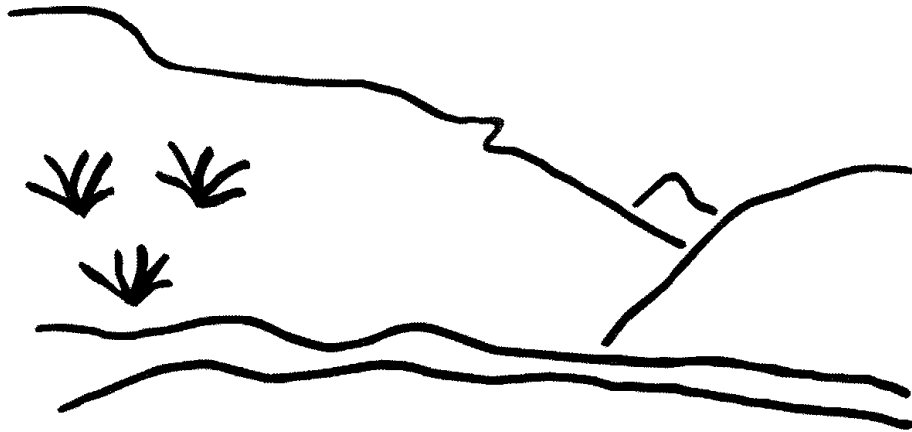
If you have any questions, please call me at (801) 538-5268 or Wayne Western at (801) 538-5263.

Sincerely,

Pamela Grubaugh-Littig  
Permit Supervisor

an  
Enclosure  
cc: Price Field Office  
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# State of Utah



## Utah Oil Gas and Mining

### Coal Regulatory Program

Willow Creek Mine  
Plateau Mining Corporation  
C/007/038-AM03B  
Technical Analysis  
June 16, 2003



## TECHNICAL ANALYSIS

The Division ensures compliance with the Surface Mining Control and Reclamation Act of 1977(SMCRA). When mines submit a Permit Application Package or an amendment to their Mining and Reclamation Plan, the Division reviews the proposal for conformance to the R645-Coal Mining Rules. This Technical Analysis is such a review. Regardless of these analyses, the permittee must comply with the minimum regulatory requirements as established by SMCRA.

Readers of this document must be aware that the regulatory requirements are included by reference. A complete and current copy of these regulations and a copy of the Technical Analysis and Findings Review Guide can be found at <http://ogm.utah.gov/coal>

This Technical Analysis (TA) is written as part of the permit review process. It documents the Findings that the Division has made to date regarding the application for a permit and is the basis for permitting decisions with regard to the application. The TA is broken down into logical section headings, which comprise the necessary components of an application. Each section is analyzed and specific findings are then provided which indicate whether or not the application is in compliance with the requirements.

Often the first technical review of an application finds that the application contains some deficiencies. The deficiencies are discussed in the body of the TA and are identified by a regulatory reference, which describes the minimum requirements. In this Technical Analysis we have summarized the deficiencies at the beginning of the document to aid in responding to them. Once all of the deficiencies have been adequately addressed, the TA will be considered final for the permitting action.

It may be that not every topic or regulatory requirement is discussed in this version of the TA. Generally only those sections are analyzed that pertain to a particular permitting action. TA's may have been completed previously and the revised information has not altered the original findings. Those sections that are not discussed in this document are generally considered to be in compliance.



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## INTRODUCTION

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# INTRODUCTION

On April 28, 2003, the Division received an amendment (AM03B) from the Permittee at the Willow Creek Mine to discontinue subsidence monitoring. The Permittee wants to discontinue subsidence monitoring because mining operations have ceased. All mining with the exception of development work was done by longwall methods. Additional information was received on June 12, 2003.

On January 22, 2003, the Division approved an amendment requesting a reduction in water monitoring based on there had been no change in water quality since mining operations ceased. One of the main reasons the Division monitors subsidence is to determine potential impacts to water resource.



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**OPERATION PLAN**

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## **OPERATION PLAN**

### **SUBSIDENCE CONTROL PLAN**

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

#### **Analysis:**

##### **Subsidence Control Plan**

On April 28, 2003, the Division received amendment AM03B, to discontinue subsidence monitoring. The Permittee requested that subsidence monitoring no longer be required based on:

- Due to unfortunate events only a small amount of subsidence occurred.
- The surface has stabilized and due to the nature of longwall mining, additional subsidence is unlikely. Subsidence reports were included in the amendment.
- Water quality remains stable.

The Division reviewed the subsidence monitoring reports. The subsidence reports begin in 1997 and end in 2002.

With the exception of one monitoring station, all measurements were less than 1.0 foot. The small amount of subsidence is due to the limited amount of mining before the mine was closed. Drawing 1 shows that limited mining occurred in two longwall sections.

Usually the Division notices that 90% of the amount of subsidence will occur within nine months of mining. After four years of no mining, the subsidence points appear to have stabilized. Since the ground surface is stabilized, this suggests that subsidence has ceased.

The Division reviewed the information in the amendment and found that continued subsidence monitoring is not needed because:

- Most of the planned subsidence has already occurred.
- Any additional subsidence should be small.
- The site is stable and additional monitoring is not expected to be beneficial.

The Permittee did include a statement that to be inserted into the MRP stating that subsidence monitoring would cease.



**Findings:**

The Permittee has met the minimum requirements of this section.

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